

The Honorable Lauren King

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

PROTEGO HOLDINGS CORPORATION, a
Washington Corporation,

Plaintiff,

v.

BLACKIE CAPITAL, INC., et al,

Defendants,

Case No. 2:25-cv-00535

**PLAINTIFF'S RESPONSE TO
COURT'S MAY 21, 2025 SECOND
ORDER TO SHOW CAUSE**

RESPONSE

COMES NOW, Protego Holdings Corporation, Plaintiff herein, and responds to this Court's May 21, 2025 Second Order to Show Cause directing Plaintiff to explain why this case should not be dismissed in for lack of subject matter jurisdiction. The Order follows from Defendant Akerman LLP's corporate and diversity disclosure statement indicating that one of the partners of Akerman LLP is a citizen of the state of Washington and that Akerman is therefore a citizen of the State of Washington.

Upon receipt of the Order, Plaintiff's counsel met and conferred with Akerman's counsel about Akerman's alleged Washington citizenship. In light of the parties' discussions and Akerman's representations identifying the partner of the LLP who is a citizen of Washington and detailing the facts on which his citizenship is based, Plaintiff agrees that there is not complete diversity of the parties in this action. Absent objection by any appearing defendant who has

1 already filed an answer, Plaintiff will dismiss the case without prejudice within seven (7) days of
2 filing this Response.

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5 DATED: June 4, 20245

Respectfully submitted,

6 /s/

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